June 13, 2001

3VI

Document Processing Center (7407)
Office of Pollution, Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460
Attention: Section 8(e) Coordinator

Re: TSCA Section 8(e) Supplemental Submissions: Docket Nos. 8EHQ-1180-373 and 8EHQ-1180-374

Dear Sir/Madam:

3M Company ("3M") requests that EPA redesignate, to the TSCA Section 8(e) docket, three studies which 3M previously submitted to EPA and are presently contained in "For Your Information" (FYI) docket number 1378 (also known as AR-226). These studies and information supplement 3M's previous 8(e) submissions in Docket Numbers 8EHQ-1180-373 and 8EHQ-1180-374.

Attachment One lists the three studies for which 3M requests redesignation. We have endeavored to include sufficient identifying information to facilitate the redesignation, including date of study submission; study title; study date; study type; and chemical. These studies consist of a range finding rat teratology study on one fluorochemical and two eye irritation studies on fluorochemical mixtures containing di-ethyl glycol butyl ether; these data are consistent with information already included in the TSCA Section 8(e) docket or in the published literature for these or related compounds, but 3M has concluded these data may not be, strictly speaking, "corroborative" of previously reported or published information as defined in EPA's reporting guidance.

3M appreciates EPA's attention to this matter. Please do not hesitate to contact the undersigned if you have any questions or require further information regarding this submission.

Very truly yours,

Dr. Katherine E. Reed, Ph.D

Executive Director

3M Environmental Technology

And Safety Services

Studies To Be Moved To 8(e) Docket

| EPA Submission Date | Chemical/ Product Name | Study Title | Laboratory | Study No. | Study Date | Study Type |
|---------------------------|--|---|--------------------------|-----------|---------------|--|
| 06/28/2000 | K PFOS mixture; T-1328; AFFF; FC- 600; 12% DEGBE | Primary Eye Irritation Study - Rabbits (T-1328) | Biosearch, Inc | | 10/06/1975 | Health Effects: Dermal/Eye Irritation |
| 06/28/2000 | T-5293; FC-95; K PFOS Mixture; AFFF; FC-206CF; 10% DEG(M)BE | Primary Eye Irritation/Corrosion Study of T-5293 in Rabbits | Hazelton Laboratories | 01102305 | 01/25/1991 | Health Effects: Dermal/Eye Irritation |
| 08/31/2000 | T-3352; FM-3422; N-EtFOSE Alcohol | Pilot Rat Teratology Study T- 3352 | Hazelton Laboratories | 154-159 | 05/11/1983 | Health Effects: Developmental Toxicity |